## REMARKS

This Application has been carefully reviewed in light of the Office Action dated November 19, 2007 ("*Office Action*"). In the Office Action, Claims 1-20 are pending and rejected. Applicants have amended Claims 1, 8, 18, and 20. Applicants submit that no new matter is added by these amendments. Applicants respectfully request reconsideration and favorable action in this case.

### Section 112 Rejections

The *Office Action* rejects Claims 1 and 8 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner states that "[t]here is no support in the specification for the following limitations added to Claims 1 and 8: "in response to receiving the user request, determining a domain name associated with the entry and a domain name associated with the user; allowing the user to access the entry if the domain name associated with the entry is the same as the domain associated with the user; and not allowing the user to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user."" (*Office Action*, page 2). Although Applicant disagrees with the rejection of Claims 1 and 8 on this basis, Applicant has amended Claims and 8 to advance prosecution of this case. Applicant has removed the language identified by the Examiner. Amended Claim 1 now recites "matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user." Amended Claim 8 includes certain similar features and operations.

Applicants respectfully submit that the Specification provides adequate support for the new claim elements. As noted by the Examiner, paragraph 350 of Applicant's Specification states that certain embodiments "enforce[] access control by only allowing a User access to the sub-tree under the User's account entry." As further exemplary support, Applicant directs the Examiner to Paragraphs 158 and 159 of Applicants' Specification. That portion of the Specification states:

TModels can be changed (or retired/hidden) by the user who published them. Placing them under the entry representing the user makes the security simple. For example, if the TModel lies in the sub-tree under the user entry, then it can be modified. If not, then it can not.

In more detail, if the DN (Distinguished Name) of the user trying to make the change matches a prefix of the DN of the TModel, the entry can be modified by that user, otherwise it can not. The Directory can be used to make this determination (Naming exception if the DN doesn't exist), or the UDDI server can do it.

(*Specification*, Paragraphs 158 and 159). These are but a few examples of support in the Specification for Applicant's steps of "matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user," as recited in Claim 1 and analogously recited in Claim 8.

For at least these reasons, Applicant submits that Claims 1 and 8 are in accordance with 35 U.S.C. § 112, first paragraph. Applicant respectfully requests that these rejections be withdrawn and the claims allowed.

Claims 18 and 20 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner states that "[i]t is unclear as to what the term "entry" is referring to." (*Office Action*, page 3). Applicant has amended Claims 18 and 20 to address the issues identified by the Examiner. For example, Claim 18 now recites "logically representing each User object, Business Entity object, and TModel object on each server, each User object, Business Entity object, and TModel object only stored on a selected one of the plurality of servers." Claim 20 recites certain similar claim features and operations.

For at least these reasons, Applicant submits that Claims 18 and 20 are in accordance with 35 U.S.C. § 112, second paragraph. Applicant respectfully requests that these rejections be withdrawn and the claims allowed.

## Section 101 Rejections

The *Office Action* rejects Claims 1-7, 15, 17, and 18 under 35 U.S.C. §101 because the claims are directed to a method for use in a web services arrangement. Specifically, the Examiner states with regard to each of independent Claims 1 and 8 that the "allowing access or not allowing access to an entity . . . remain in the abstract and, thus fail to achieve the required status of having real world value." (*Office Action*, page 4). Applicant respectfully disagrees.

In section 101, Congress deemed that "any new and useful process" constitutes patentable subject matter:

> Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefore, subject to the conditions and requirements of this title.

35 U.S.C. § 101. The Supreme Court and Federal Circuit have interpreted the statute broadly, stating that statutory subject matter should essentially "include anything under the sun that is made by man." *AT&T Corp. v. Excel Communications, Inc.*, 172 F.3d 1352, 1355, 50 U.S.P.Q.2d 1447 (Fed. Cir. 1999) (citing *Diamond v. Chakrabarty*, 447 U.S. 303, 309, 206 U.S.P.Q. 193 (1980)). Although the courts have specifically identified three categories of subject matter that are not patentable (laws of nature, natural phenomena, and abstract ideas), the Federal Circuit has clarified that a method claim qualifies as patentable subject matter when it "produces a useful, concrete, [and] tangible result." *Id.* at 1358. Thus, producing a useful, concrete, and tangible result is the key to patentability according to *State Street* and other applicable case law.

Applicant submits that each of independent Claims 1 and 8 produce a useful, concrete, and tangible result and, thus, is directed to statutory subject matter. Claims 1 and 8

do not identify laws of nature, natural phenomenon, or abstract ideas. Claims 1 and 8 are not abstract mathematical algorithms. For example, Claims 1 recites "receiving a request to modify an object from a user." According to Claim 1, a match is identified between "a distinguished name associated with the user and at least a portion of the distinguished name associated with the object." The user is then provided "access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user." Finally, Claim 1 recites "modifying the object as requested by the user in response to the user accessing the object." Thus, Claim 1 produces a useful, concrete, and tangible result. One example of such a useful, concrete, and tangible result includes "providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user." Another example of such a useful, concrete, and tangible result includes "modifying the object as requested by the user" in response to matching the distinguished name associated with the object and the distinguished name associated with the user and providing the user access to the object. For analogous reasons, independent Claim 8 also produces a useful, concrete, and tangible result and is directed to statutory subject matter.

Thus, Applicants respectfully submit that Claims 1 and 8 are directed to statutory subject matter. Because Claims 1 and 8 are directed to statutory subject matter, Applicants respectfully request the Board to direct the Examiner to withdraw the rejection of Claims 1-20 under 35 U.S.C. § 101.

## Section 103 Rejections

The Office Action rejects Claims 1-17 and 19 under 35 U.S.C. §103(a) as being unpatenable over U.S. Patent Application Publication No. 2006/0059107 issued to Elmore et al. ("*Elmore*") in view of U.S. Patent Application Publication No. 2004/0002955 issued to Gadbois et al. ("*Gadbois*"). Applicants respectfully request reconsideration and allowance of Claims 1-17 and 19 for the reasons discussed below.

Independent Claim 1 of the present Application, as amended, recites:

> A method for use in a Web Services arrangement comprising:
>
> arranging User object(s) under a repository layer comprising one or more Repository objects collectively forming a Prefix, each User object representing a Web Services account;
>
> arranging Business Entity object(s) under User object(s);
>
> arranging corresponding TModel object(s) under at least one of User object(s), Repository object and Prefix;
>
> receiving a request to modify an object from a user;
>
> matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object;
>
> providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user; and
>
> modifying the object as requested by the user in response to the user accessing the object.

Initially, Applicant notes that the *Office Action* does not identify any portion of the cited references as disclosing Applicant's "matching" step. Additionally, the *Office Action* does not identify any portion of the cited references as disclosing Applicant's former "allowing" step, which has been replaced with a new "providing" step. Applicant assumes that the *Office Action's* failure to do so is related to the Examiner's determination that the identified steps lacked written description support in Applicant's Specification. Applicant has shown above, however, that Applicant's Specification does indeed support the recited Claim language. Accordingly, Applicant submits that the recited steps must be considered in determining the patentability of the claims over the cited references. (*See*, M.P.E.P. § 2143.03, which states "[a]ll words in a claim must be considered in judging the patentability of that claim against the prior art." ). Further, Applicant respectfully submits that, whether considered alone or in combination, the cited references do not disclose, teach, or suggest this combination of claim elements.

Specifically, neither *Elmore* nor *Gadbois* disclose, teach, or suggest "matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user," as recited in Claim 1. Rather, *Elmore*, which is relied upon for disclosure of receiving a user request for an entry, merely discloses:

(1) A user clicks a link on a page. Referring to FIG. 10 which illustrates a sample page 210, a user enters information to open a trouble ticket against a product in the hierarchy, and clicks submit button 211. Referring to FIG. 9, the entered data along with the originating page, destination page, and task (CreateTrouble-Ticket, Trouble-TicketRecap, and submit) are sent via an HTTP request 161 to the Web session controller 162.

(*Elmore*, paragraph 195). Thus, the cited portion merely discloses that to submit a Trouble Ticket, the user clicks a link and enters information about a product. There is no disclosure in *Elmore* of "matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" or of "providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user," as recited in Claim 1. Because the recited claim elements are also not disclosed in *Gadbois*, which is limited to a registry service that uses "a publisher assertion regarding a relationship between entities (e.g., business or other types of entities) is encoded within a directory information tree in a memory" (*Gadbois*, Abstract), Applicant submits that Claim 1 is allowable over the proposed *Elmore-Gadbois* combination.

For at least these reasons, Applicants request reconsideration and allowance of Claim 1, together with Claims 2-7 and 17 that depend on Claim 1.

The Examiner also relies upon the proposed *Elmore-Gadbois* combination reject independent Claim 8. However, Claim 8 recites "code for matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object." Claim 8 still further recites "code for providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user" and "code for modifying the object as requested by the user in response to the user accessing the object." Therefore, for reasons analogous to those discussed above with regard to Claim 1, Applicants respectfully contend that Claim 8 is allowable over the proposed *Elmore-Gadbois* combination. For at least these reasons, Applicants request reconsideration and allowance of Claim 8, together with Claims 9-16 and 19 that depend on Claim 8.

The Office Action rejects Claims 18 and 20 under 35 U.S.C. §103(a) as being unpatenable *Elmore* in view *Gadbois* as applied to Claims 1-17 and 19 above, and further in view of U.S. Patent Application Publication No. 2003/0236956 issued to Grubbs et al. ("*Grubbs*"). Applicants respectfully request reconsideration and allowance of Claims 18 and 20 for the reasons discussed below.

Dependent Claims 18 and 20 depend upon independent Claims 1 and 8, respectively, which Applicant has shown above to be allowable. Accordingly, dependent Claims 2-7 and 9-16 are not obvious over the proposed *Elmore-Gadbois-Grubbs* combination at least because Claims 18 and 20 include the limitations of their respective independent claims. Since Claims 18 and 20 incorporate the limitations of their respective independent claims, Applicant has not provided detailed arguments with respect to Claims 18 and 20. However, Applicant remains ready to do so if it becomes appropriate. Applicant respectfully requests reconsideration and allowance of Claims 18 and 20.

## CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending Claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants believe no fee is due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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